

Before the FEDERAL COMMUNICATIONS COMMISSION, Washington, D.C. 20554

In the Matter of Broadcast Localism, FCC Docket No. 10803
Reference National Association of Broadcasters/MB Docket 04-233

COMMENTS BY A PRIVATE CITIZEN and CAREER BROADCASTER

RE: BROADCAST LOCALISM - IN PARTICULAR, IN REGARDS TO DISSEMINATION
OF INFORMATION UNDER EMERGENCY CONDITIONS and EFFECT OF
CONSOLIDATION OF LOCAL BROADCAST FACILITIES BY LARGE CONGLOMERATE
STATION OWNERS

Filing Date: November 15, 2004

As a career broadcaster, currently employed in network television operations, but also with a history of more than 25 years in on-air radio programming and news in Florida and elsewhere around the country (and a degree in Telecommunication from the University of Florida), I am concerned with the issue of LOCALISM IN BROADCASTING, especially in regards to two issues: (1) On-air opportunities for local artists, in particular musicians, and (2) Emergency information provided to the public on radio during severe weather conditions, in particular hurricanes, as experienced in Florida during the summer and fall of 2004. Comments pertaining to issue (1) have already been filed with the FCC under proceeding RM 10803, Type Code CO, March 16, 2004. The following is an additional comment pertaining to issue (2).

During hurricane and tropical storm conditions experienced on a repeated basis during the current year in the metropolitan area generally identified as the Tampa Bay area of Florida, electric power was frequently interrupted for long periods of time. Without electricity, emergency weather information on television is generally not available. The public thereby must rely on battery operated radio for this essential, sometime life-threatening information. Generally speaking, radio broadcasters in the Tampa Bay area failed in this regard during the recent storms experienced in this area. The following is a summary of why this assessment should come under FCC review:

1. Large conglomerate radio operations, in particular Clear Channel Communications, consolidated all or nearly all emergency communications to a single source, which in turn was distributed across both AM and FM bands to all their various frequencies. It was a source of enormous frustration to hear precisely the same emergency programming information all across the dial on both bands, coming from one studio, without any opportunity to select from different programming sources or search for alternative information relevant to particular needs during the emergency period. This observation is not a complaint about the quality of information coming from Clear Channel, but is a complaint about the lack of availability of different kinds of information on the

different frequencies in use during the storms. It can only be regarded as a disservice to the many different local communities within the large metropolitan area affected by the storms to restrict programming information to one source and to distribute this single stream of data over the whole spectrum of stations operated by the large, multi-station corporate owners.

2. Smaller radio operations with limited resources often carried simulcast audio signals from local television stations, which in turn frequently did not take into account the fact that listeners, without electricity or the ability to view video displays, were simply not getting the complete picture. Additionally, television reporting, while excellent and extremely valuable when presented in complete audio and video form, relied heavily on the visual display of storm location, direction and intensity, while audio information - which was the only source of information available to radio listeners - often was unrelated or only supplemental to the visual programming being broadcast. Radio stations that relied totally on television audio presented only partial storm coverage, and again fell far short of the obligation of radio owners to provide essential, timely, and relevant information to their listeners.

3. Other smaller radio operations seemed to disregard the emergency conditions altogether, carrying regularly scheduled, often nationally syndicated programming with only limited (if any) information relevant to the emergency conditions being experienced in the local communities and across the metropolitan area in general.

4. All of these broadcast conditions resulted in an extremely limited number of sources of information available to the public

If the FCC is genuinely concerned about localism, and the responsibility of broadcasters - in particular radio station owners and operators - to provide life-saving information to audiences during emergency conditions such as hurricanes and severe weather conditions, a review of policies that result in group ownership of large numbers of stations, and other policies that permit and encourage re-broadcasting of aura signals originating from television stations, should be undertaken with a focus on service to local communities and individuals who depend on these services for information critical to their very survival. In particular, group station and absentee owners and operators who reduce programming to a single or limited number of sources, rely on TV audio, or continue with regular programming as if nothing unusual is occurring during such emergency conditions, should be cited for failing to address issues urgently relevant to their immediate, local audiences.

Respectfully submitted:

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